

Systems: Principles, Design, & Implementation” by Ricardo (“*Ricardo*”) and U.S. Patent Number 5,819,275 by Badger et al. (“*Badger*”).

Claims 5, 7-9, 17, and 19-21 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Olds*, *Ricardo*, and *Badger* in view of U.S. Patent Number 5,684,990 by Boothby (“*Boothby*”).

Claims 6 and 18 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Olds*, *Boothby*, *Badger*, and *Ricardo* in view of information officially noticed to be well known, allegedly (“the Official Notice”).

Claims 10-12 and 22-24 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Olds*, *Boothby*, *Badger*, and *Ricardo* in view of U.S. Patent Number 5,802,518 by Karaev et al. (“*Karaev*”).

The rejections are respectfully traversed.

RESPONSE TO REJECTIONS BASED ON THE ALLEGED PRIOR ART

Claims 1-4 and 13-16

Claims 1 and 13 feature the following limitations:

- storing hierarchy data that identifies
 - a set of nodes that correspond to ORG-UNITS associated with the organization; and
 - hierarchical relationships between said nodes that reflect hierarchical relationships between the ORG-UNITS that correspond to said nodes;
- establishing a first mapping between the users and the set of nodes based on the ORG-UNITS to which the users belong;
- establishing a second mapping between the documents in said set of documents and the set of nodes; and**
- determining which documents in said set of documents a user is allowed to access based on the hierarchy data, the first mapping and the second mapping.

The third Office Action seems to agree that even the combination of *Olds* and *Ricardo* would not produce the method of Claim 1 or the computer-readable medium of Claim 13. Even if it were possible to combine these two references, the combination would appear to result in a

hierarchy of the kind shown in Ricardo's Figure 10.3, except with the inheritable access control lists of Olds associated with the "organizational" records/nodes of Ricardo. Such a result still would lack any documents associated with the "organizational" records/nodes, and there does not appear to be any reason to associate access control lists with "organizational" records/nodes anyway, because organizational entities are not the kinds of things to which access typically is or needs to be controlled.

Apparently recognizing this deficiency in the combination of *Olds* and *Ricardo*, the third Office Action relies upon *Badger* to disclose, allegedly, document references stored in a hierarchical structure. The third Office Action takes the position that the addition of this "missing piece" is all that is needed to complete a puzzle that would disclose all of the limitations of Claims 1 and 13.

Admittedly, *Badger* does disclose a hierarchy of files (FIG. 4B), in which one file may be a "child" of another file. The third Office Action analogizes files to documents, and the Applicants do not dispute that particular analogy. *Badger* also appears to disclose that, through an "ADB association," attributes may be associated with paths in the file hierarchy, so that a group of attributes associated with a particular path may be implicitly associated with all files that occur within that path in the file hierarchy.

The third Office Action contends that one of ordinary skill in the art would have been motivated to combine *Olds*, *Ricardo*, and *Badger* because *Badger* "discloses the advantage of binding documents that are in a hierarchy to attributes stored in a **separate hierarchical structure** . . . such that the document hierarchy need not be modified." It appears from this statement in the third Office Action that the benefit of avoiding the modification of a document hierarchy is derived from the separate nature of the alleged attribute hierarchy; after all, if the attributes were not separate from the document hierarchy, then it might be necessary to modify the document hierarchy whenever the attributes were modified. Therefore, Applicants will assume that the third Office Action is not attempting to argue that some hierarchical relationship

between the attributes is derived from the hierarchical relationships between the files in the paths to which the attributes are mapped.

Although *Badger* discloses associations between (a) attributes and (b) paths of a file hierarchy, there is no teaching or suggestion in *Badger* that the attributes themselves are in a hierarchical structure that is separate and distinct from the file hierarchy. In other words, in *Badger*, there is no concept of one group of attributes being the “child” of another group of attributes. The “ADB association” shown in FIG. 7B, in which attributes are mapped to path descriptors, is not a hierarchical relationship.

The third Office Action apparently takes the position that *Badger* discloses a file hierarchy and a separate attribute hierarchy (which, as discussed above, *Badger* actually fails to teach or suggest) in which nodes of the fictional attribute hierarchy are mapped to nodes of the file hierarchy. The third Office Action apparently takes the position that, because (a) the fictional attribute hierarchy of *Badger* is a hierarchy, allegedly, and (b) the combination of *Olds* and *Ricardo* results in a hybrid hierarchy, allegedly, one of ordinary skill in the art would have been motivated to replace the fictional attribute hierarchy in *Badger* with the hybrid hierarchy of *Olds/Ricardo* to produce the hybrid hierarchy of *Olds/Ricardo* except with the nodes in that hierarchy mapped to files (alleged “documents”) in *Badger*’s file hierarchy.

However, because *Badger* does not actually teach or suggest any attribute hierarchy, this replacement cannot occur; *Badger* cannot be combined with *Olds* and *Ricardo* to produce this result.

Claims 1 and 13 require documents to be mapped to nodes in a hierarchy, where the relationships between the nodes in the hierarchy reflect relationships between ORG-UNITs in an organization. Even if the combination of *Olds* and *Ricardo* produced a hybrid hierarchy of nodes in which the relationships between the nodes reflected relationships between ORG-UNITs in an organization, the combination of *Olds*, *Ricardo*, and *Badger* still would not, and indeed does not, produce any mapping between any node of such a hybrid hierarchy and any document.

For at least the above reasons, it is respectfully submitted that Claims 1 and 13 are patentable over the cited art, and are in condition for allowance.

Claims 2-4 and 14-16 are dependent claims, each of which depends (directly or indirectly) on either Claim 1 or Claim 13. Each of Claims 2-4 and 14-16 is therefore allowable for the reasons given above with respect to Claims 1 and 13. In addition, each of Claims 2-4 and 14-16 introduces one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case, a separate discussion of those limitations is not included at this time.

Claims 5-12 and 17-24

Claims 5-12 depend from Claim 1. Claims 17-24 depend from Claim 13. As discussed above, Claims 1 and 13 require “establishing a second mapping between the documents in said set of documents and the set of nodes.” By virtue of their dependence from Claims 1 or 13, Claims 5-12 and 17-24 also include this limitation.

As discussed above, *Olds*, *Ricardo*, and *Badger*, taken individually or in combination, do not in any way teach or suggest this limitation. Thus, Claims 5-12 and 17-24 are patentable over *Olds*, *Ricardo*, and *Badger*, taken individually or in combination.

Boothby, *Karaev*, and the Official Notice also fail to teach or suggest this limitation. In fact, the Office Action does not even allege that *Boothby*, *Karaev*, or the Official Notice discloses or suggests this limitation. Thus, Claims 5-12 and 17-24 are patentable over *Boothby*, *Karaev*, and the Official Notice, taken individually.

Even combined (assuming *arguendo* that it would have been obvious to combine the references), *Olds*, *Ricardo*, *Badger*, *Boothby*, *Karaev*, and the Official Notice fail to disclose or suggest all of the limitations of Claims 5-12 and 17-24. As discussed above, none of these references discloses or suggests, “establishing a second mapping between the documents in said set of documents and the set of nodes.” Thus, even if the references were combined, they would still fail to disclose or suggest this aspect of Claims 5-12 and 17-24. For at least this reason,

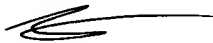
Applicants submit that Claims 5-12 and 17-24 are patentable over *Olds, Ricardo, Badger, Boothby, Karaev*, and the Official Notice, taken individually or in combination.

CONCLUSION

For at least the reasons set forth above, Applicant respectfully submits that all pending claims are patentable over the art of record, including the art cited but not applied. Accordingly, allowance of all claims is hereby respectfully solicited.

Respectfully submitted,

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